

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

PJM INTERCONNECTION, LLC, directly)	
and derivatively on behalf of Power Edge,)	
LLC,)	
)	C.A. No. 08-216-JJF
Plaintiff,)	
)	
v.)	
)	
MARK GORTON, TOWER RESEARCH)	
CAPITAL LLC, TOWER RESEARCH)	
CAPTIAL INVESTMENTS, LLC, ACCORD)	
ENERGY, LLC, BJ ENERGY, LLC,)	
FRANKLIN POWER, LLC, GLE TRADING,)	
LLC, OCEAN POWER, LLC, PILLAR)	
FUND, LLC, AND POWER EDGE LLC,)	
)	
Defendants.)	

**MOTION AND ORDER
FOR ADMISSION PRO HAC VICE**

Pursuant to Local Rule 83.5 and the attached certifications, counsel moves the admission *pro hac vice* of David B. Tulchin, Richard J.L. Lomuscio and Brian L. Frye to represent defendants in this matter.



Daniel A. Dreisbach (#2583)
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Steven J. Fineman (#4025)
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Richards Layton & Finger
One Rodney Square
920 North King Street
Wilmington, DE 19801
302-651-7700
Attorneys for Defendants

Dated: May 7, 2008

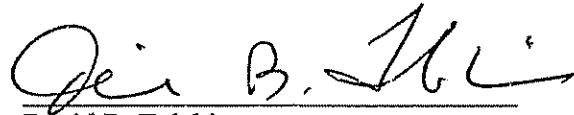
ORDER GRANTING MOTION

IT IS HEREBY ORDERED that counsel's motion for admission *pro hac vice* is granted on this _____ day of May, 2008.

United States District Judge

**CERTIFICATION BY COUNSEL
TO BE ADMITTED PRO HAC VICE**

Pursuant to Local Rule 83.5, I hereby certify that I am eligible for admission to this Court, am admitted, practicing and in good standing as a member of the Bar of the State of New York, and pursuant to Local Rule 83.6, submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify I am generally familiar with this Court's Local Rules. In accordance with Standing Order for District Court Fund effective 1/1/05, I further certify that the annual fee for \$25.00 has been paid ☐ to the Clerk of the Court, or, if not paid previously, the fee payment will be submitted ☒ to the Clerk's Office upon the filing of this motion.

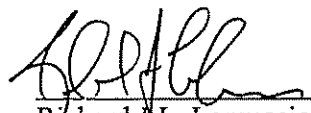


David B. Tulchin
Sullivan & Cromwell LLP
125 Broad Street
New York, NY 10004-2498

Dated: May 6, 2008

**CERTIFICATION BY COUNSEL
TO BE ADMITTED PRO HAC VICE**

Pursuant to Local Rule 83.5, I hereby certify that I am eligible for admission to this Court, am admitted, practicing and in good standing as a member of the Bar of the State of New York and State of New Jersey, and pursuant to Local Rule 83.6, submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify I am generally familiar with this Court's Local Rules. In accordance with Standing Order for District Court Fund effective 1/1/05, I further certify that the annual fee for \$25.00 has been paid ☐ to the Clerk of the Court, or, if not paid previously, the fee payment will be submitted ☒ to the Clerk's Office upon the filing of this motion.

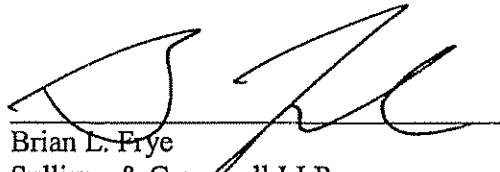


Richard J.L. Lomuscio
Sullivan & Cromwell LLP
125 Broad Street
New York, NY 10004-2498

Dated: May 6, 2008

CERTIFICATION BY COUNSEL
TO BE ADMITTED PRO HAC VICE

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Brian L. Frye
Sullivan & Cromwell LLP
125 Broad Street
New York, NY 10004-2498

Dated: May 6, 2008

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

CERTIFICATE OF SERVICE

I hereby certify that on May 7, 2008, I electronically filed the foregoing document with the Clerk of Court using CM/ECF which will send notification of such filing(s) and Hand Delivered to the following:

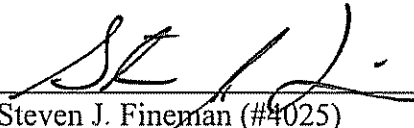
BY HAND DELIVERY

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Wilmington, DE 19899

I hereby certify that on May 7, 2008, I have sent by Federal Express, the foregoing document to the following non-registered participant:

BY FEDERAL EXPRESS

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